

APPEAL,E-FILE,E-NTC,JURY,PROSE-NP,TYPE-F

**U.S. District Court**  
**District of Columbia (Washington, DC)**  
**CIVIL DOCKET FOR CASE #: 1:25-cv-00633-TNM**  
***Internal Use Only***

PENDSE v. COMMISSIONER OF INTERNAL REVENUE  
Assigned to: Judge Trevor N. McFadden  
Demand: \$95,699,000  
Cause: 28:1331 Federal Question: Other Civil Rights

Date Filed: 03/04/2025  
Jury Demand: Plaintiff  
Nature of Suit: 870 Taxes  
Jurisdiction: U.S. Government Defendant

**Plaintiff****SHONA S. PENDSE**

represented by **SHONA S. PENDSE**  
18301 Bright Plume Ter  
4005 Wisconsin Ave., NW  
#9632  
Boyds, MD 20841  
617-329-5245  
Email: [spendseformal@gmail.com](mailto:spendseformal@gmail.com)  
PRO SE

V.

**Defendant****COMMISSIONER OF INTERNAL  
REVENUE**

represented by **Olga L. Tobin**  
U.S. DEPARTMENT OF JUSTICE  
P.O. Box 227  
Ben Franklin Station  
Washington, DC 20530  
(202) 737-4700  
Fax: (202) 514-6866  
Email: [olga.l.tobin@usdoj.gov](mailto:olga.l.tobin@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant****UNITED STATES OF AMERICA**

Date Filed	#	Docket Text
03/04/2025	<u>1</u>	COMPLAINT against COMMISSIONER OF INTERNAL REVENUE ( Filing fee \$ 405, receipt number 209162) with Jury Demand filed by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Part 1, # <u>3</u> Part 2, # <u>4</u> Part 3, # <u>5</u> Part 4, # <u>6</u> Part 5, # <u>7</u> Part 6, # <u>8</u> Part 7, # <u>9</u> Part 8, # <u>10</u> Part 9, # <u>11</u> Civil Cover Sheet)(mg) (Entered: 03/07/2025)
03/04/2025		SUMMONS (3) Issued Electronically as to COMMISSIONER OF INTERNAL REVENUE, U.S. Attorney and U.S. Attorney General (mg) (Entered: 03/07/2025)

03/04/2025	<u>2</u>	MOTION for Leave to Proceed in forma pauperis by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit)(mg) (Entered: 03/07/2025)
03/04/2025	<u>3</u>	MOTION for CM/ECF Password by SHONA S. PENDSE. (mg) (Entered: 03/07/2025)
03/04/2025	<u>4</u>	NEW Pro Se Consent To Receive Notices of Electronic Filing by SHONA S. PENDSE (mg) (Entered: 03/07/2025)
03/04/2025	<u>5</u>	MOTION for Summary Judgment by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit)(mg) (Entered: 03/07/2025)
03/07/2025	<u>6</u>	STANDING ORDER Establishing Procedures for Cases Before Judge Trevor N. McFadden. The parties are hereby ORDERED to read and comply with the directives in the attached standing order. Signed by Judge Trevor N. McFadden on 3/7/2025. (lctnm1) (Entered: 03/07/2025)
03/10/2025		MINUTE ORDER: Plaintiff's <u>5</u> Motion for Summary Judgment is DENIED without prejudice. After Defendant is served and responds to the Complaint, the Court will hold a scheduling conference and order briefing deadlines. Plaintiff may then resubmit her Motion for Summary Judgment at that time. SO ORDERED. Signed by Judge Trevor N. McFadden on 3/10/2025. (lctnm1) (Entered: 03/10/2025)
03/11/2025	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. COMMISSIONER OF INTERNAL REVENUE served on 3/4/2025 (mg) (Entered: 03/12/2025)
03/11/2025	<u>8</u>	MOTION for Injunction by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit)(mg) (Entered: 03/13/2025)
03/13/2025	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 3/4/2025. Answer due for ALL FEDERAL DEFENDANTS by 5/3/2025. (mg) (Entered: 03/17/2025)
03/13/2025	<u>10</u>	ERRATA by SHONA S. PENDSE re <u>8</u> Motion for Injunction. (mg) (Entered: 03/17/2025)
03/18/2025	<u>11</u>	Memorandum in opposition to re <u>8</u> Motion for Injunction filed by COMMISSIONER OF INTERNAL REVENUE. (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Certificate of Service)(Tobin, Olga) (Entered: 03/18/2025)
03/21/2025		MINUTE ORDER: The Court GRANTS Plaintiff's <u>3</u> Motion for CM/ECF Password. The Clerk's Office is directed to provide Plaintiff with a username and password. SO ORDERED. Signed by Judge Trevor N. McFadden on 3/21/2025. (lctnm1) (Entered: 03/21/2025)
03/24/2025	<u>12</u>	ORDER denying Plaintiff's <u>2</u> Motion for Leave to Proceed In Forma Pauperis. See attached Order for details. Signed by Judge Trevor N. McFadden on 3/24/2025. (lctnm1) (Entered: 03/24/2025)
03/28/2025	<u>13</u>	REPLY to opposition to motion re <u>8</u> Motion for Injunction filed by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit Exhibits A–H, # <u>2</u> Exhibit Exhibits 301–382, # <u>3</u> Exhibit Exhibits 401–451, # <u>4</u> Exhibit Exhibit 501, # <u>5</u> Exhibit Exhibits 601–621, # <u>6</u> Exhibit Exhibit 701, # <u>7</u> Exhibit Exhibits 801–803, # <u>8</u> Exhibit Exhibits 399a, # <u>9</u> Exhibit Exhibits 399b, # <u>10</u> Exhibit Exhibits 399c, # <u>11</u> Exhibit Exhibits 399d, # <u>12</u> Exhibit Exhibits 499a, # <u>13</u> Exhibit Exhibits 499b, # <u>14</u> Exhibit Exhibits 499c, # <u>15</u>

		Exhibit Exhibits 499d, # <u>16</u> Exhibit Exhibits 499e, # <u>17</u> Exhibit Exhibits 499f)(PENDSE, SHONA) (Entered: 03/28/2025)
03/28/2025	<u>14</u>	MOTION for Reconsideration re <u>12</u> Order on Motion for Leave to Proceed in forma pauperis by SHONA S. PENDSE. (PENDSE, SHONA) (Entered: 03/28/2025)
04/01/2025	<u>15</u>	Emergency MOTION for Hearing <i>on motion for injunction</i> by SHONA S. PENDSE. (PENDSE, SHONA) (Entered: 04/01/2025)
04/01/2025	<u>16</u>	MEMORANDUM ORDER denying Plaintiff's <u>8</u> Motion for Preliminary Injunction and <u>15</u> Motion for Hearing on Preliminary Injunction. See attached Order for details. Signed by Judge Trevor N. McFadden on 4/1/2025. (lctnm1) (Entered: 04/01/2025)
04/01/2025		MINUTE ORDER: The Court DENIES Plaintiff's <u>14</u> Motion for Reconsideration of Leave to Proceed In Forma Pauperis. Plaintiff has a six-figure annual income and cannot show that "because of [her] poverty" she is unable to pay the fees associated with her case while still providing "the necessities of life" for herself and her dependents. <i>McKelton v. Bruno</i> , 428 F.2d 718, 719–20 (D.C. Cir. 1970). SO ORDERED. Signed by Judge Trevor N. McFadden on 4/1/2025. (lctnm1) (Entered: 04/01/2025)
04/03/2025	<u>17</u>	AMENDED COMPLAINT <i>against United States of American and against COMMISSIONER OF INTERNAL REVENUE</i> with Jury Demand filed by SHONA S. PENDSE. (Attachments: # <u>1</u> Summons, # <u>2</u> Exhibit A to H, # <u>3</u> Exhibit 301–384, # <u>4</u> Exhibit 401–451, # <u>5</u> Exhibit 501, # <u>6</u> Exhibit 601–621, # <u>7</u> Exhibit 701, # <u>8</u> Exhibit 801–803, # <u>9</u> Exhibit 399 part a, # <u>10</u> Exhibit 399 part b, # <u>11</u> Exhibit 399 part c, # <u>12</u> Exhibit 399 part d, # <u>13</u> Exhibit 499 part a, # <u>14</u> Exhibit 499 part b, # <u>15</u> Exhibit 499 part c, # <u>16</u> Exhibit 499 part d, # <u>17</u> Exhibit 499 part e, # <u>18</u> Exhibit 499 part f)(PENDSE, SHONA) (Entered: 04/03/2025)
04/03/2025	<u>18</u>	MOTION that Defendant timely reply to complaint <i>as amended</i> by SHONA S. PENDSE. (PENDSE, SHONA) (Entered: 04/03/2025)
04/09/2025	<u>19</u>	ENTERED IN ERROR..... MOTION for Leave to Appeal in forma pauperis by SHONA S. PENDSE. (PENDSE, SHONA) Modified on 4/10/2025 (znmw). (Entered: 04/09/2025)
04/09/2025	<u>20</u>	MOTION for Reconsideration <i>of denial of Injunction</i> by SHONA S. PENDSE. (Attachments: # <u>1</u> Exhibit 901 – Brain Death by Small Hypoxic Cuts, # <u>2</u> Exhibit 902, # <u>3</u> Exhibit 903)(PENDSE, SHONA) (Entered: 04/09/2025)
04/09/2025	<u>21</u>	MOTION for Reconsideration <i>of denial of MSJ</i> re <u>16</u> Order by SHONA S. PENDSE. (PENDSE, SHONA) Modified to add link on 4/10/2025 (znmw). (Entered: 04/09/2025)
04/09/2025	<u>22</u>	NOTICE OF INTERLOCUTORY APPEAL re 3/10/2025 Minute Order on <u>5</u> Motion for Summary Judgment by SHONA S. PENDSE. Fee Status: No Fee Paid. Parties have been notified. (PENDSE, SHONA) Modified to add link on 4/10/2025 (znmw). (Entered: 04/09/2025)
04/09/2025	<u>23</u>	NOTICE OF INTERLOCUTORY APPEAL re <u>16</u> Memorandum Order on <u>8</u> Motion for Injunction by SHONA S. PENDSE. Fee Status: No Fee Paid. Parties have been notified. (PENDSE, SHONA) Modified to add link on 4/10/2025 (znmw). (Entered: 04/09/2025)
04/10/2025		

		NOTICE OF ERROR regarding <u>19</u> MOTION for Leave to Appeal in forma pauperis . The following error(s) need correction: Incorrect event. Please refile as a Notice of Interlocutory Appeal. (znmw) (Entered: 04/10/2025)
04/10/2025	<u>24</u>	NOTICE OF INTERLOCUTORY APPEAL re <u>12</u> Order on Motion for Leave to Proceed In Forma Pauperis by SHONA S. PENDSE. Fee Status: No Fee Paid. Parties have been notified. (PENDSE, SHONA) Modified to add link on 4/11/2025 (znmw). (Entered: 04/10/2025)
04/11/2025	<u>25</u>	Transmission of the Notice of Appeal, Order Appealed (Memorandum Opinion), and Docket Sheet to US Court of Appeals. The fee remains to be paid and another notice will be transmitted when the fee has been paid in the District Court or motion to proceed In Forma Pauperis has been decided re <u>22</u> Notice of Interlocutory Appeal. (znmw) Modified on 4/11/2025 (znmw). (Entered: 04/11/2025)

**United States District Court for the District of Columbia**

Shona S. Pendse

*Plaintiff*

v.

Docket No. 25-cv-633-TNM

Commissioner of Internal Revenue

**and the United States of America,**

*Defendants*

**NOTICE OF APPEAL OF DENIAL OF MSJ**

Plaintiff, Dr. Shona Pendse, a medical doctor who has dedicated her life to caring for patients and doing research, *pro se*, hereby, respectfully notes her appeal to the United States Court of Appeals for the District of Columbia of this court's minute order of March 10, 2025 denying her motion for summary judgment ("MSJ").

Plaintiff notes that she has a pending motion to reconsider the denial of the MSJ, but since that motion was filed more than 28 days after the order, she does not believe it tolls here time to file a notice of appeal, and thus, she respectfully simultaneously notes her appeal.

Respectfully submitted,

/s/ Shona Pendse, M.D.

all service to sPendseFormal @ gmail.com

### **Certificate of Service**

Upon filing, this document will be served on all parties by the court's ECF system.

/s/ Shona Pendse, M.D.